

Douglas E. McKinley, Jr.  
Law Office of Douglas E. McKinley, Jr.  
8350 Grandridge Blvd., Suite 200  
Kennewick, WA 99336  
(509) 628-0809

Attorney for Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON, RICHLAND

**UNITED STATES OF  
AMERICA**

**Plaintiffs,**

v.

**JOSE MARIA LOPEZ  
ORDUNO and ANGELICA  
VIVIANA SANCHEZ**

**Defendants,**

Case No.: 4:20-CR-6002-SAB

**RESPONSE TO NOTICE OF  
JOINDER**

Defendant Angelica Viviana Sanchez, by and through her attorney  
Douglas E. McKinley, Jr., respectfully submits the following response to the  
government's Notice of Joinder (ECF 52) regarding the above

-1 RESPONSE TO NOTICE OF JOINDER

Law Office of Douglas E. McKinley, Jr.  
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(509) 628-0809  
(509) 392-8083 fax  
doug@mckinleylaw.com

1 referenced cause.

2 On or about February 4, 2020, this Court entered and Order setting the date  
3 for trial in the government's case against Jose Maria Lopez Orduno to commence  
4 July 6, 2020. On or about February 20, 2020, Defendant Angelica Viviana  
5 Sanchez was arraigned on her initial appearance (ECF 44). On or about March 2,  
6 2020, this Court entered and Order setting the date for trial in this matter on April  
7 27, 2020 (ECF 51). On or about March 13, 2020, the United States filed a Notice  
8 of Joinder (ECF 52) requesting that the Court "set Defendant Sanchez on the same  
9 schedule for trial as has been set for Co-Defendant Orduno. The United States also  
10 requests the Court to strike the Pretrial Conference and Jury Trial as assigned to  
11 Defendant Sanchez."

12 Pursuant to 18 U.S.C. § 3161(c)(1) Defendant Sanchez has a right to have  
13 the trial in her case commence within 70 days of the later of the filing of the  
14 information or indictment or her arraignment. Moving Ms. Sanchez trial to  
15 commence on July 6, 2020 falls outside of the seventy day time limit set forth in  
16 the statute. At this time, Ms. Sanchez does not waive her right to a speedy trial  
17 pursuant to 18 U.S.C. § 3161(c)(1), and therefore objects to the government's  
18 requests that the court set Defendant Sanchez on the same schedule for trial as has  
19  
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25 -2 RESPONSE TO NOTICE OF JOINDER

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1 been set for Co-Defendant Orduno and that the Court strike the Pretrial Conference  
2 and Jury Trial as assigned to Defendant Sanchez.  
3  
4

5 Dated: March 14, 2020

6 By s/ Douglas E. McKinley, Jr.  
7 Douglas E. McKinley, Jr.  
8 WSBA # 20806  
9 Law Office of Douglas E. McKinley, Jr.  
10 8350 Grandridge Blvd., Suite 200  
11 Kennewick, WA 99336  
12 (509) 628-0809  
13 (509) 396-8083 fax  
14 doug@mckinleylaw.com

15 Certificate of Service

16 I hereby certify that on March 14, 2020, I electronically filed the foregoing with  
17 the Clerk of the Court using the CM/ECF System which will send notification of  
18 such filing to the following: Stephanie A. Van Marter, Assistant United States  
19 Attorney.  
20  
21  
22  
23  
24

25 s/ Douglas E. McKinley, Jr.  
Douglas E. McKinley, Jr.